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March 17, 2022

**VIA CM/ECF**

The Honorable Sharon A. King, U.S.M.J.  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, New Jersey 08101

Re: Emily Van Duyne v. Dr. Harvey Kesselman, et al.  
Civil Action, Docket No. 1:19-cv-21091

Dear Judge King:

This office represents the Defendants in the above referenced matter. As part of discovery Plaintiff propounded a request for documents with twenty-six itemized requests. Many of these requests required an extensive electronic data search of Stockton University's database, which took several months for Stockton University's Information Technology Department to conduct. Recently, our client produced to our office tens of thousands of documents that were yielded by the search.

Upon initial review of the documents, we discovered that many of these documents fell outside the purview of Plaintiff's requests, and are therefore unresponsive. Unfortunately, it seems as though Stockton's search yielded many documents that contained certain key terms within the search parameters, but still fell outside of the parameters of Plaintiff's requests.

After conferring with our clients and Plaintiff's counsel, we have agreed to manually review all of the documents yielded from Stockton's search and produce to Plaintiff only those that are responsive to her requests. We have further agreed to provide the documents on a rolling basis, with the first production to be made on March 18, 2022.

For this reason, Defendants respectfully request a ninety-day extension of all pending discovery deadlines to allow for the review and production of documents and all responses to discovery requests. I have spoken to Patricia Barasch, Esq., counsel for Plaintiff, and she has graciously consented to this request. If this request is granted, Defendants' response to Plaintiff's written discovery requests will be due on May 21, 2022 and all discovery deadlines will be



March 17, 2022

Page 2

extended by ninety-days.

I thank Your Honor for your courtesies in this regard. If Your Honor would like the undersigned to file a formal motion regarding this application, I would be happy to file same.

Respectfully submitted,  
MATTHEW J. PLATKIN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: /s/Hasibul Haque  
Hasibul Haque  
Deputy Attorney General

C: Patricia Barasch, Esq. (via ECF)